

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Consolidated Action: Lead Case]

**FAIR MAPS PLAINTIFFS' NOTICE OF DESIGNATION
OF TESTIFYING EXPERTS**

Pursuant to the Court's December 17, 2021 Scheduling Order, ECF No. 96, and the Parties' May 10, 2022 Joint Stipulation Modifying Expert Deadlines, ECF No. 268, Plaintiffs Fair Maps Texas Action Committee, OCA-Greater Houston, the North Texas Chapter of the Asian Pacific Islander Americans Public Affairs Association, Emgage, Khanay Turner, Angela Rainey, Austin Ruiz, Aya Eneli, Sofia Sheikh, Jennifer Cazares, Niloufar Hafizi, Lakshmi Ramakrishnan, Amatullah Contractor, Deborah Chen, Arthur Resa, Sumita Ghosh, and Anand Krishnaswamy (collectively, "Fair Maps Plaintiffs"), through their undersigned counsel, hereby designate the following testifying experts in this case:

I. Retained Expert Witnesses

1. Loren Collingwood, PhD.
Associate Professor of Political Science at the University of New Mexico.
1 University of New Mexico
Albuquerque, NM 87131
lcollingwood@unm.edu
Dr. Collingwood will testify regarding his report and file materials served under separate cover on May 20, 2022.
2. Monica Martinez, PhD.
Associate Professor of History at the University of Texas at Austin.
128 Inner Campus Dr. B7000
Austin, TX 78712
monica.martinez1@austin.utexas.edu
Dr. Martinez will testify regarding her report and file materials served under separate cover on May 20, 2022.
3. Doug Spencer, PhD.
Associate Professor of Law at the University of Colorado, Boulder.
Wolf Law Building | 401 UCB
2450 Kitteredge Loop Road
Boulder, CO 80309
douglas.spencer@colorado.edu
Dr. Spencer will testify regarding his report and file materials served under separate cover on May 20, 2022.

II. Non Retained Expert Witnesses

The Fair Maps Plaintiffs hereby designate and state that they intend to call for the purpose of fact and/or opinion testimony those persons listed in the witness disclosures of each party, as appropriate. Fair Maps Plaintiffs specifically give notice that they intend to rely on the expert testimony of other Plaintiffs groups. To streamline trial presentation and not present overly duplicative testimony, Fair Maps Plaintiffs will rely on expert opinions given by other Plaintiffs and their counsel. The designation of experts, reports, and expert disclosures served by other Plaintiffs are incorporated herein for all purposes. Fair Maps Plaintiffs make this designation without conceding the qualifications,

reliability, relevancy, or admissibility of such witness' opinions.

III. Supplementation and Amendment Disclaimer

Fair Maps Plaintiffs specifically reserve the right to supplement and/or amend these designations, including the expert reports provided with these designations, to review, assess, and incorporate as necessary any discovery that becomes available after this designation.

Pursuant to the Court's December 17, 2021 Scheduling Order, Fair Maps Plaintiffs shall on this day serve on all parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B).

Dated: May 20, 2022

Respectfully submitted.

/s/ David Donatti

Noor Taj

P.A. State Bar No. 309594*

Allison J. Riggs

N.C. State Bar No. 40028*

Hilary Harris Klein

N.C. State Bar No. 53711

Mitchell Brown

N.C. State Bar No. 56122

Southern Coalition for Social Justice

1415 West Highway 54, Suite 101

Durham, NC 277057

Telephone: 919-323-3380

Fax: 919-323-3942

Allison@southerncoalition.org

Noor@scsj.org

hilaryhklein@scsj.org

mitchellbrown@scsj.org

David A. Donatti

TX Bar No. 24097612

Ashley Harris

TX Bar No. 24078344

Thomas Buser-Clancy

TX Bar No. 24123238
Andre I. Segura
TX Bar No. 24107112
ACLU Foundation of Texas, Inc.
P.O. Box 8306
Houston, TX 77288
Tel. (713) 942-8146
Fax. (713) 9428966
ddonati@aclutx.org
ahariss@aclutx.org
N.Y. State Bar No. 4426458*
Susana Lorenzo-Giguere
N.Y. State Bar No. 2428688*
Patrick Stegemoeller
N.Y. State Bar No. 5819982*
ASIAN AMERICAN LEGAL
DEFENSE AND EDUCATION FUND
99 Hudson Street, 12th Floor
New York, NY 10013
(212) 966-5932 (phone)
(212) 966-4303 (fax)
jvattamala@aaldef.org
slorenzo-giguere@aaldef.org
pstegemoeller@aaldef.org

*Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that I filed this document using the Court's ECF System, and that a copy of this filing was served on all counsel of record through that system on May 20, 2022.

/s/ David Donatti
David Donatti